REMARKS

Claims 1-4, 6-12 and 15-19 are pending in this application. All of the pending claims were rejected under 35 U.S.C. 103(a) as being unpatentable over Hellebust in view of Lee. Claims 1, 9 and 17 are currently amended. Reconsideration is respectfully requested.

The presently claimed invention distinguishes the cited combination because it can be employed by an enterprise to provide alerts to an employee via a service provider network without requiring infrastructure modifications to the service provider network, and without requiring detailed knowledge of the topology of the service provider network. Hellebust describes a technique in which the wireless network infrastructure (102) receives messages via the PSTN (103) and the Internet (104). As shown in Fig. 2, alert generation, filtering and other processing of the message is performed in the wireless network infrastructure. For example, step (201) states that the message is received at the wireless infrastructure, and subsequent step (206) states that the alert is sent. The Hellebust technique would therefore require modification of the wireless infrastructure, i.e., the service provider network, in order to support the described steps. In the case where the technique is implemented by a service provider, such as the assignee of Hellebust - AT&T Wireless Services, no particular third party permission would be required to modify the service provider's own network, and topology information is already known. In contrast, however, the presently claimed invention allows an enterprise to provide alerts to an employee that can only be reached via a service provider network, without requiring modification of the service provider network, and without requiring service provider network topology information. It is well known that service providers jealously guard information about their network topology, and tightly control modifications to their network. Hence, the Hellebust technique could not practically be implemented by an enterprise, and without the presently

claimed invention the enterprise wishing to provide the alerts to an employee might have no other option than purchasing the service from the service provider. However, the invention provides another option for the enterprise. In particular, the alert generation and processing takes place in the enterprise network, such as at notification server (202), and the alert is forwarded to the user in a manner that does not require extensive topology knowledge or infrastructure changes in the service provider network, such as with a Wireless Access Protocol (WAP) push protocol.

The distinguishing features described above are emphasized in the amended claims. For example, claim 1 recites "collecting, in the first communication network, information regarding at least two message events ... pushing the alert, via a second communication network, to a wireless device associated with the user using a Wireless Access Protocol (WAP) push protocol without knowledge of topology of the second communication network." Similarly, claim 9 recites "means in the first communication network for collecting information regarding at least two message events associated with the message feeds ... means for pushing the alert, via a second communication network, to a wireless device associated with the user using a Wireless Access Protocol (WAP) push protocol without knowledge of topology of the second communication network." Similarly, claim 17 recites "a notification server in the first communication network adapted to be coupled to both of the first and second messaging servers, the notification server collecting information about at least two messages stored for certain of the plurality of users by the first message feed and the second message feed, the notification server being adapted to push alerts, via a second communication network, without knowledge of topology of the second communication network using a Wireless Access Protocol (WAP) push protocol based on the collected information to wireless devices associated with the certain users." Claims 2-4, 6-8, 10-12, 15-16 and 18-19 are dependent claims which further distinguish the invention, and which are

allowable for the same reasons stated above with regard to their respective base claims. For the reasons stated above, withdrawal of the rejections of claims 1-4, 6-12 and 15-19 is respectfully requested.

The Office argues at page 4 of the OA that the Hellebust "wireless infrastructure" is equivalent to a notification server. However, those elements are not equivalent because the wireless infrastructure, i.e., service provider network, is a public shared network designed to support many customers. Hence, the Hellebust technique involves transmission of potentially sensitive information across public shared networks, and intermingling of such information from different customers on the same public shared processing device. The Hellebust technique therefore suffers from potential security problems. In contrast, the presently claimed invention allows sensitive information to be filtered, such as described in the Specification at page 10, line 16 through page 11, line 6, and withheld in the relative security of the enterprise network. For example, the user or enterprise could configure the notification server with filtering rules that prevent sensitive messages originating in the enterprise from ever reaching the public network. This distinguishing feature is also recited in claims 1, 9 and 17. Withdrawal of the rejection based on the cited combination is therefore requested.

In addition to the reasons stated above, the cited combination itself is improper because sufficient motivation to combine the cited references has not been shown. A *prima facie* case of obviousness under 35 U.S.C. 103 must include a showing of a suggestion, teaching or motivation that would have led a person of ordinary skill in the art to combine the cited references *in the particular manner claimed.* See In re Dembiczak, 175 F.3d 994, 998 (Fed. Cir. 1999), and In re Kotzab, 217 F.3d 1365, 1371 (Fed. Cir. 2000). In this case, the Office has not established that a person or ordinary skill in the art would be motivated to combine the cited combinations of

references in the particular manner of the corresponding rejected claims. Withdrawal of the rejection based on the cited combination is therefore requested.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Holmes W. Anderson, Applicants' Attorney at 978-264-4001 (X305) so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

May 23, 2005
Date

Holmes W. Anderson, Reg. No. 37,272
Attorney/Agent for Applicant(s)
Steubing McGuinness & Manaras LLP
125 Nagog Park
Acton, MA 01720
(978) 264-6664

Docket No. 061473/0269982 120-058
dd: 05/24/2005